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August 4, 2009

By Hand Delivery

Mr. James A. (Jac) Capp
Georgia Department of Natural Resources
Environmental Protection Division
Air Protection Branch
4244 International Parkway, Suite 120
Atlanta, GA 30354

RECEIVED

AUG 04 2009

AIR PROTECTION BRANCH

RE: Application No. 17924, dated January 17, 2008
Plant Washington
Sandersville, Georgia
Project No. 6122-07-0007

Dear Mr. Capp:

On behalf of our client Power4Georgians, LLC (P4G), please find attached replacement pages providing supplemental data to the above referenced application, as well as an attached CD containing updated Class I Area screening analysis modeling runs. Given the complexities of multi-source modeling using the CALPUFF model, and concerns regarding the Class I Inventory, our client has decided to proceed by proposing an SO₂ emission limit for the main facility boiler of 0.08 lb/MMBtu (24-hr average). Use of this proposed 24-hr emission limit in the CALPUFF model demonstrates, as seen on the attached CD, that the facility “screens out” of Class I modeling.¹ In its letter of July 27, 2009 addressed to Mr. Ken Hiltgen of MACTEC, EPD suggested that this approach could be followed to address the agency’s possible concerns.

The above referenced application proposed a short term 3-hr SO₂ emission limit of 959 lb/hr, a 30-day rolling average SO₂ emission limit of 0.069 lb/MMBtu, and a 12-month rolling average SO₂ limit of 0.052 lb/MMBtu. P4G is now proposing a 24-hr maximum emission limit of 0.08 lb/MMBtu for the main facility boiler. By utilizing this 24-hr SO₂ emission limit in the CALPUFF model, the screening analysis indicates a maximum 24-hr modeled SO₂ impact at Wolf Island that is less than the screening level of 0.2 µg/m³. Therefore, consistent with EPA and EPD modeling guidance and protocols, a refined SO₂ increment modeling evaluation of the Wolf Island Class I Area is not required. For these reasons, the P4G PSD permit application is being amended as follows:

¹ P4G followed a similar approach for other Class II modeling that is included with the PSD permit application. There, as here, by demonstrating that the maximum predicted ambient impact is below the applicable “screening criteria,” the need to perform complex, multi-source modeling is eliminated.

1. **Section 4: Page 4-8 (Table 4-2).** A footnote has been added to the table indicating that a 24-hr SO₂ emission limit of 0.08 lb/MMBtu has now been proposed for modeling purposes to screen out of refined modeling for the Wolf Island Class I Area.
2. **Section 5: Page 5-14 (Table 5-3):** A footnote has been added to the table discussing the modeled rates used for SO₂ modeling evaluations in the AERMOD and CALPUFF models.
3. **Section 7: Pages 7-10 to 7-12 (Table 7-10).** Pages 7-10 to 7-12 were modified to reflect removal of discussions of the refined SO₂ increment modeling for the Wolf Island Class I Area, and update the 24-hr SO₂ modeled results in Table 7-10. Table 7-12 (CALPUFF SO₂ PSD Increment Modeling Results for Wolf Island Class I Area) has now been removed.
4. **Exhibit A: Page A-1.** This page has been revised to include the proposed 24-hr emission rate limit in the calculations.

Tables C-3, C-4, and C-5 of Exhibit C (Georgia, South Carolina, and Florida sources used in Class I Area Increment Modeling) are now no longer needed. Please discard these sections of your copy of the application. As stated previously, MACTEC concludes that it has supplied all of the information needed to support the Director of EPD's decision to issue a PSD permit to P4G for Plant Washington.

If you have any questions, please contact me at (770) 421-3335 or Ken Hiltgen at (770) 421-3334.

Sincerely,

MACTEC ENGINEERING AND CONSULTING, INC.



Justin Fickas
Senior Engineer



Ken Hiltgen
Project Manager/Principal

Cc: Purva Prabhu, EPD
Peter Courtney, EPD
Jim Ussery, EPD
C. Dean Alford, Allied

Table 4-2 BACT Analysis Summary Table

Source	Pollutant	Control Technology	Emission Limit (lb/MMBtu)	Proposed Compliance Test Method
Supercritical Pulverized Coal (SCPC) Boiler	Particulate Matter (PM/PM ₁₀)	Fabric Filter Baghouse	Total PM ₁₀ – 0.018 lb/MMBtu (3-hr. Avg.)	PM ₁₀ – USEPA Method 201A/202 or USEPA CTM-039/40
			Filterable PM – 0.012 lb/MMBtu (24-hr. Block Avg.)	CEMS
	Nitrogen Oxides (NO _x)	LNB/OFA/SCR	0.05 lb/MMBtu – 30-day Rolling Avg.	CEMS
	Carbon Monoxide (CO)	Combustion Controls	0.10 lb/MMBtu – 30-day Rolling Avg. 0.30 lb/MMBtu 1-hr. Avg.	CEMS
	Volatile Organic Compounds (VOC)	Combustion Controls	0.0030 lb/MMBtu – 3 hr. Avg.	USEPA Method 25A Minus USEPA Method 18 (Methane Removal)
	Sulfur Dioxide (SO ₂) ¹	Wet Flue Gas Desulfurization (WFGD)	0.052 lb/MMBtu 12-month rolling average 0.069 lb/MMBtu 30-day rolling average 959 lb/hr 3-hr. average Minimum 97.5% Removal	CEMS
	Fluorides (as HF)	Wet Flue Gas Desulfurization (WFGD)	2.17 x 10 ⁻⁴ lb/MMBtu	USEPA Method 13A or USEPA Method 26A
	Sulfuric Acid Mist (H ₂ SO ₄)	Sorbent Injection and Wet Flue Gas Desulfurization (WFGD)	0.004 lb/MMBtu 3-hr. Avg.	USEPA CTM-013 (Controlled Condensate Method 8A)
	Mercury (Hg)	Multi-control: Sorbent Injection In Conjunction With SCR/FF/WFGD	1.68 x 10 ⁻⁶ lb/MMBtu 15 x 10 ⁻⁶ lb/MW-hr 12-month rolling average	CEMS

¹ A 24-hr SO₂ emission rate limit of 0.08 lb/MMBtu has been proposed for modeling purposes to screen out of refined SO₂ modeling for the Wolf Island Class I area. Compliance with this proposed limit would be demonstrated through the use of CEMS.

Table 5-3 Screen Modeling Source Emissions

Source	UTM Coordinates		PME _s 24 Hour	PM ₁₀ 24 Hour	SO ₂ 3 and 24 Hour ¹	SO ₂ Annual	NO _x	CO 1-Hour	CO 8-Hour	HF	H ₂ SO ₄	Pb	Height	Diameter	Velocity	Temp ²
	East (m)	North (m)														
Coal-fired Boiler	337088.13	3659815.90	12.93	18.82	120.83	120.83	52.29	313.74	313.74	0.23	4.18	1.67E-02	137.16	9.14	18.55	333
Auxiliary Boiler	337408.11	3659768.01	3.53E-01	0.73	1.51	0.151	3.02	1.21E+00	1.21E+00	9.65E-07	1.81E-03	2.72E-04	32.43	12.19	19.81	408
Cooling Tower No. 1	337021.84	3659703.97	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 2	337033.91	3659716.04	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 3	337033.91	3659691.90	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 4	337045.97	3659703.97	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 5	337045.97	3659679.83	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 6	337058.04	3659691.90	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 7	337058.04	3659667.76	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 8	337070.11	3659679.83	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 9	337070.11	3659655.69	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 10	337082.18	3659667.76	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 11	337082.18	3659643.62	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 12	337094.25	3659643.62	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 13	337094.25	3659631.55	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 14	337106.32	3659619.48	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 15	337106.32	3659619.48	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 16	337118.39	3659607.41	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 17	337118.39	3659607.41	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 18	337130.46	3659619.48	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 19	337130.46	3659605.34	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 20	337142.53	3659607.41	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 21	337142.53	3659583.27	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 22	337154.60	3659595.34	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 23	337154.60	3659571.20	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 24	337166.67	3659583.27	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 25	337166.67	3659559.13	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 26	337178.74	3659571.20	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 27	337178.74	3659547.06	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 28	337190.81	3659559.13	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 29	337190.81	3659534.99	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 30	337202.88	3659547.06	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 31	337202.88	3659522.92	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 32	337214.95	3659534.99	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 33	337214.95	3659510.86	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Cooling Tower No. 34	337227.02	3659522.92	2.78E-05	6.35E-03	-	-	-	-	-	-	-	-	15.24	12.19	6.07	0
Trasher House Dust Collector	337335.40	3660114.80	2.07E-02	0.130	-	-	-	-	-	-	-	-	59.13	0.79	17.25	0
Tripper Decoder	337350.40	3659853.00	1.56E-02	9.72E-02	-	-	-	-	-	-	-	-	18.29	0.41	0.001	0
Limestone Preparation Building	337101.10	3659891.40	7.29E-03	2.70E-02	-	-	-	-	-	-	-	-	47.24	0.25	0.001	399
Fly Ash Mechanical Extractors (Fly Ash Filter Separator)	337222.30	3659877.30	6.89E-03	1.30E-02	-	-	-	-	-	-	-	-	47.24	0.25	0.001	354
Fly Ash Silo	337222.30	3659890.40	4.29E-03	8.10E-03	-	-	-	-	-	-	-	-	22.86	0.41	0.001	0
Mercury Storage and Handling	337237.60	3659870.40	2.03E-03	2.03E-03	-	-	-	-	-	-	-	-	22.86	0.41	0.001	0
SO ₂ Storage and Handling	337228.50	3659870.40	2.03E-03	2.03E-03	-	-	-	-	-	-	-	-	22.86	0.41	0.001	0
Soda Ash Storage and Handling	337293.70	3659850.70	1.01E-03	1.01E-03	-	-	-	-	-	-	-	-	22.86	0.41	0.001	0
Hydrated Lime Storage and Handling	337293.70	3659860.60	2.78E-04	1.01E-03	-	-	-	-	-	-	-	-	22.86	0.41	0.001	0
PRE Stackout (Insertable Dust Collector)	337175.75	3660421.69	1.30E-03	8.10E-03	-	-	-	-	-	-	-	-	33.53	0.30	0.001	0
Illinois No. 6 Stackout (Insertable Dust Collector)	337313.30	3660516.57	1.30E-03	8.10E-03	-	-	-	-	-	-	-	-	27.43	0.30	0.001	0
Limestone Stackout (Insertable Dust Collector)	337169.45	3660003.07	2.19E-03	8.10E-03	-	-	-	-	-	-	-	-	21.34	0.30	0.001	0

¹ SO₂ 3-hr, 24-hr, and annual models in AERMOD conservatively evaluated utilizing the proposed 3-hr BACT emission limit of 959 lb/hr (120.83 g/s). Class I screening analysis evaluation (in Section 7.3) utilized a proposed 24-hr SO₂ emission rate of 0.08 lb/MMBtu in the evaluation of the 24-hr SO₂ impacts to the defined Class I areas. Both the 3-hr and annual SO₂ Class I screening analysis utilized the proposed 3-hr emission rate limit of 959 lb/hr (120.83 g/s).

² 0 indicates ambient temperature used on the model.

averaging periods and for all three years of meteorological data. Each of the computed maximum concentrations for each pollutant's averaging periods was below their respective significant impact levels currently established by USEPA. The screening analysis for SO₂ conservatively utilized the proposed 3-hr SO₂ emission rate limit for the evaluation of both the 3-hr and annual modeled impacts to the evaluated Class I Areas. The screening analysis evaluation for the modeled 24-hr impacts to the evaluated Class I Areas utilized the proposed 24-hr SO₂ emission rate limit.

Currently, there is not an official Class I screening level for PM_{2.5}. The EPA has, however, proposed three options for PM_{2.5} Class I screening levels under its rule proposed on September 21, 2007. Under this proposed rule, the lowest option would be a Class I significance level of 0.04 µg/m³ and 0.08 µg/m³ for the annual and 24-hour averaging period. The modeled concentrations for PM₁₀ are below these levels, therefore, because PM_{2.5} is a subset of PM₁₀, the modeled PM_{2.5} concentrations would also be below these levels. No additional modeling for PM_{2.5} was therefore required.

Table 7-9 CALPUFF Class I PM₁₀ Screening Analysis

Annual PM ₁₀ Screening Results						
Class I Area	Model Year			Max. Conc. (µg/m ³)	Level (µg/m ³)	Below Screening Level?
	2001	2002	2003			
Cape Romain	2.32E-03	2.54E-03	2.41E-03	2.54E-03	0.2	Yes
Cohutta Wilderness	1.35E-03	1.81E-03	1.84E-03	1.84E-03	0.2	Yes
Great Smokey Mountains	1.02E-03	1.12E-03	1.56E-03	1.56E-03	0.2	Yes
Joyce Kilmer Slickrock	9.85E-04	1.18E-03	1.43E-03	1.43E-03	0.2	Yes
Okefenokee	1.43E-03	3.36E-02	1.01E-03	3.36E-02	0.2	Yes
Shining Rock	1.35E-03	1.53E-03	1.87E-03	1.87E-03	0.2	Yes
Wolf Island	1.98E-03	2.10E-03	1.85E-03	2.10E-03	0.2	Yes
24-Hour PM ₁₀ Screening Results						
Class I Area	Model Year			Max. Conc. (µg/m ³)	Level (µg/m ³)	Below Screening Level?
	2001	2002	2003			
Cape Romain	2.78E-02	3.85E-02	4.23E-02	4.23E-02	0.3	Yes
Cohutta Wilderness	2.93E-02	2.90E-02	3.56E-02	3.56E-02	0.3	Yes
Great Smokey Mountains	2.42E-02	1.95E-02	4.06E-02	4.06E-02	0.3	Yes
Joyce Kilmer Slickrock	2.14E-02	1.81E-02	4.29E-02	4.29E-02	0.3	Yes
Okefenokee	3.63E-02	3.36E-02	2.61E-02	3.63E-02	0.3	Yes
Shining Rock	3.35E-02	3.17E-02	3.81E-02	3.81E-02	0.3	Yes
Wolf Island	3.45E-02	3.47E-02	5.70E-02	5.70E-02	0.3	Yes

Prepared by: BSA 7/2/09
 Checked by: SAK 7/2/09

Table 7-10 CALPUFF Class I SO₂ Screening Analysis

Annual SO ₂ Results						
Class I Area	Model Year			Max. Conc. (µg/m ³)	Screening Level (µg/m ³)	Below Screening Level?
	2001	2002	2003			
Cape Romain	7.68E-03	7.67E-03	7.65E-03	7.68E-03	0.1	Yes
Cohutta Wilderness	3.87E-03	4.71E-03	4.44E-03	4.71E-03	0.1	Yes
Great Smokey Mountains	2.34E-03	2.31E-03	2.83E-03	2.83E-03	0.1	Yes
Joyce Kilmer Slickrock	2.34E-03	2.46E-03	2.70E-03	2.70E-03	0.1	Yes
Okefenokee	4.56E-03	4.98E-03	2.94E-03	4.98E-03	0.1	Yes
Shining Rock	3.57E-03	3.27E-03	4.31E-03	4.31E-03	0.1	Yes
Wolf Island	7.21E-03	7.90E-03	7.36E-03	7.90E-03	0.1	Yes
24-Hour SO ₂ Results						
Class I Area	Model Year			Max. Conc. (µg/m ³)	Screening Level (µg/m ³)	Below Screening Level?
	2001	2002	2003			
Cape Romain	0.0734	0.1107	0.0969	0.11	0.2	Yes
Cohutta Wilderness	0.0839	0.0756	0.0912	0.09	0.2	Yes
Great Smokey Mountains	0.0662	0.0510	0.0556	0.07	0.2	Yes
Joyce Kilmer Slickrock	0.0493	0.0421	0.0438	0.05	0.2	Yes
Okefenokee	0.0748	0.0745	0.0674	0.07	0.2	Yes
Shining Rock	0.1096	0.0823	0.1039	0.11	0.2	Yes
Wolf Island	0.1211	0.1178	0.1996	0.1996	0.2	Yes
3-Hour SO ₂ Results						
Class I Area	Model Year			Max. Conc. (µg/m ³)	Screening Level (µg/m ³)	Below Screening Level?
	2001	2002	2003			
Cape Romain	0.32	0.43	0.49	0.49	1	Yes
Cohutta Wilderness	0.55	0.71	0.49	0.71	1	Yes
Great Smokey Mountains	0.27	0.30	0.53	0.53	1	Yes
Joyce Kilmer Slickrock	0.27	0.25	0.29	0.29	1	Yes
Okefenokee	0.65	0.41	0.36	0.65	1	Yes
Shining Rock	0.41	0.35	0.58	0.58	1	Yes
Wolf Island	0.42	0.55	0.60	0.60	1	Yes

Prepared by: BSA 8/4/09
 Checked by: JDF 8/4/09

Table 7-11 CALPUFF Class I NO_x Screening Analysis

Class I Area	Model Year			Max. Conc. ($\mu\text{g}/\text{m}^3$)	Screening Level ($\mu\text{g}/\text{m}^3$)	Below Screening Level?
	2001	2002	2003			
Cape Romain	1.05E-03	1.33E-03	1.20E-03	1.33E-03	0.1	Yes
Cohutta Wilderness	6.18E-04	1.12E-03	9.54E-04	1.12E-03	0.1	Yes
Great Smokey Mountains	3.93E-04	4.03E-04	5.97E-04	5.97E-04	0.1	Yes
Joyce Kilmer Slickrock	3.16E-04	4.59E-04	6.06E-04	6.06E-04	0.1	Yes
Okefenokee	8.57E-04	8.02E-04	5.33E-04	8.57E-04	0.1	Yes
Shining Rock	7.60E-04	6.39E-04	9.82E-04	9.82E-04	0.1	Yes
Wolf Island	1.38E-03	1.93E-03	1.71E-03	1.93E-03	0.1	Yes

Completed by: BSA 7/2/09
 Checked by: SAK 7/2/09

1 Coal Fired Boiler - Stack S1

Basis	Value	Units	Reference
Gross Power Rating - Full Load	930	MW	Plant Washington Specification
Maximum Heat Input - Full Load	8300	MMBtu/hr	Plant Washington Specification
Fuel Oil Burner Rating	1300	MMBtu/hr	Plant Washington Specification
Maximum Expected Hours of Operation	8760	hr/yr	Plant Washington Specification
PM Emission Factor - Coal	0.018	lb/MMBtu	BACT
PM ₁₀ Emission Factor - Coal	0.018	lb/MMBtu	BACT
PM _{2.5} Emission Factor - Coal	0.012	lb/MMBtu	BACT
Condensable PM _{2.5} Emission Factor	53.00%		AP 42, Section 1.1 - Particulate Matter Size Distribution
SO ₂ Emission Factor - Coal	0.006	lb/MMBtu	Engineering Estimate
SO ₂ Emission Factor - Coal	959	lb/hr	BACT (3 hour averaging period) - Section 4.3.5
SO ₂ Emission Factor - Coal	0.08	lb/MMBtu	Proposed 24-hr Averaging Period
NO _x Emission Factor - Coal	0.052	lb/MMBtu	BACT (annual averaging period)
NO _x Emission Factor - Coal	0.05	lb/MMBtu	BACT (30-Day Rolling averaging period)
CO Emission Factor - Coal	0.10	lb/MMBtu	BACT (30-Day Rolling averaging period)
CO Emission Factor - Coal	0.30	lb/MMBtu	BACT (1-hour averaging period)
VOC Coal Emission Factor - Coal	0.003	lb/MMBtu	BACT
H ₂ SO ₄ Emission Factor - Coal	0.004	lb/MMBtu	BACT
Pb Emission Factor - Coal	1.60E-05	lb/MMBtu	BACT-PSD Avoidance Limit
Hg Emission Factor - Coal	1.68E-06	lb/MMBtu	BACT
HF Emission Factor - Coal	2.17E-04	lb/MMBtu	BACT
Exhaust Flow Rate	1,927,690	dscfm	Vendor Specification
Ammonia Slip Concentration	10	ppm	Vendor Guarantee
PM Emissions - Full Load	8300 MMBtu/hr	0.018 lb/MMBtu / 2,000 lb/ton	* 8,760 hr/yr = 654 ton/yr
PM₁₀ Emissions - Full Load	8300 MMBtu/hr	0.018 lb/MMBtu / 2,000 lb/ton	* 8,760 hr/yr = 654 ton/yr
PM_{2.5} (Filterable) Emissions - Full Load	8300 MMBtu/hr	0.012 lb/MMBtu / 2,000 lb/ton	* 8,760 hr/yr = 436 ton/yr
PM_{2.5} (Filterable) Emissions	436 ton/yr	= 231 ton/yr	
PM_{2.5} (Condensable) Emissions	8300 MMBtu/hr	0.006 lb/MMBtu / 2,000 lb/ton	* 8,760 hr/yr = 218 ton/yr
PM_{2.5} (Filterable + Condensable) Emissions	231 ton/yr	= 449 ton/yr	
SO₂ Emissions - Full Load (3 hr and 24 hr averaging periods) - Class II Modeling - Note: Also used for annual averaging period in Class II modeling	959 lb/hr	8760 hr/yr / 2,000 lb/ton = 4,200 ton/yr	
SO₂ Emissions - Full Load (24 hr averaging periods) - Class I Modeling	0.08 lb/MMBtu	8300 MMBtu/hr = 661 lb/hr	
SO₂ Emissions - Full Load (annual averaging periods)	8300 MMBtu/hr	0.052 lb/MMBtu / 2,000 lb/ton	* 8,760 hr/yr = 1,890 ton/yr
NO_x Emissions - Full Load	8300 MMBtu/hr	0.05 lb/MMBtu / 2,000 lb/ton	* 8,760 hr/yr = 1,818 ton/yr
CO Emissions - Full Load (Annual)	8300 MMBtu/hr	0.10 lb/MMBtu / 2,000 lb/ton	* 8,760 hr/yr = 3635.40 ton/yr
CO Emissions - Full Load (1 hr averaging period)	8300 MMBtu/hr	0.30 lb/MMBtu = 2,490 lb/hr	